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FILED

MAR X 6 2015

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

TELEDYNE TECHNOLOGIES
INCORPORATED,

Plaintiff,

v.

RAJ SHEKAR,

Defendnat.

Case No. 1:15-cv-01392
Judge Ronald A. Guzman

**MOTION TO RECUSE Judge Guzman Instanter PURSUANT TO 28 U.S.C Section 144 and
28 U.S.C Section 455(a) AND PURSUANT TO JUDICIAL and DISABILITY ACT OF 1980,
28 U.S.C. §§ 351-364 and per RULES for JUDICIAL CONDUCT JUDICIAL DISABILITY
PROCEEDINGS 248 F.R.D. 674**

AND MOTION TO STAY ALL PROCEEDINGS IN DISTRICT COURT

REQUEST RULING BY MAIL

NOW COMES the defendant, Raj Shekar (Shekar) with his special and limited appearance, and without waiving his rights objecting to this court jurisdiction in this case and continue to object this court jurisdiction, file this MOTION TO RECUSE Judge Guzman for valid and good cause shown below:

1. This court is aware that as of February 27th, 2015 the following motions are pending:
 - (a) Motion to dismiss as the District court do not have subject matter jurisdiction
 - (b) STATEMENT of COMPLIANCE as to TRO
 - (c) Motion to vacate all *ex parte* orders entered on February 17, 2015 or to grant leave to file an immediate appeal;
 - (d) Motion for leave of 60 days to seek an attorney representation
 - (e) Motion for Permanent Restraining order and Protective order against Plaintiff.
 - (f) Motion for sanctions on plaintiff and its attorneys
2. This court is also aware as of February 27, 2015, that a Notice of Appeal is filed ;
an Emergency Motion to Stay Proceedings in District Court is filed in Court of Appeals.

3. Courtesy copies of every one of the above filings were also received by this Court timely.
4. This court is further aware of a Notice of Appeal was filed on February 20, 2015 challenging the subject matter jurisdiction and all other orders entered by this court .
5. This court is divested of jurisdiction to hear any matters in this case as of Notice of Appeal date of February 20, 2015.
6. This court has no jurisdiction and divested of jurisdiction from the date of Notice of Appeal. of February 20, 2015 . Third, Fourth, Seventh, Tenth, and Eleventh Circuits viewed that the filing of a notice of an (for instance , an *divests the district court of jurisdiction* . See *Levin v. Alms & Assocs., Inc.*, 634 F.3d 260, 262 (4th Cir. 2011); *Ehleiter v. Grapetree Shores, Inc.*, 482 F.3d 207, 215 n.6 (3d Cir. 2007); *McCauley v. Halliburton Energy Servs., Inc.*, 413 F.3d 1158, 1162–63 (10th Cir. 2005); *Blinco v. Green Tree Servicing, LLC*, 366 F.3d 1249, 1253 (11th Cir. 2004); *Bradford-Scott Data Corp. v. Physician Computer Network*, 128 F.3d 504, 507 (7th Cir. 1997); see also *Bombadier Corp. v. Nat’l R.R. Passenger Corp.*, No. 02-7125, 2002 WL 31818924, at 1 ((D.C. Cir. Dec. 12, 2002)
7. The appeal is attacking the core jurisdictional issue. This court is forcing itself a jurisdiction when it is aware that plaintiff has no jurisdiction in Federal court and that :
 - Plaintiff Teledyne operates under a pseudonym “Teledyne Storm Microwave” in Woodridge ,Illinois.
 - This court is aware Teledyne Storm Microwave is an “alter ego” , alias and d/b/d entity of Plaintiff.
 - This court is aware that Teledyne Electronic Manufacturing services, another alter ego, alias, and d/b/a of Teledyne conducts extensive business in Illinois with a customer Northrop Grumman, located in Rolling Meadows, Cook County, Illinois and Shekar was a senior manager of this d/b/a entity of plaintiff.
8. This court is aware that there is no TOTAL DIVERSITY to assume jurisdiction, but deliberately assumed jurisdiction.

9. This court is aware on the face of the complaint that the jurisdictional value is all arbitrary, self serving with no foothold of facts, and alleged "ghost" damages are made-up, and plaintiff can not prove a dollar of damage, as there is none. None of the frivolous, false allegations will stand before a Jury Trial even if filed in a State court.

10. This court is aware from the motion to vacate, that plaintiff criminal intentions of obstruction of justice by seeking a TRO is solely to destroy an incriminating material evidence for the United States Justice dept investigation against the Plaintiff.

11. This court is fully aware on several occasions, since February 17, 2015, as to the false pretext behind TRO motion which is still not served to Shekar; as to the false pretext behind TRO motion through Shekar E mail letter of February 17, 2015 which is part of the record; on February 27, 2015 from Shekar motion to vacate; and Shekar motion to dismiss filed on March 3, 2015 and Shekar's STATEMENT of compliance of TRO filed on March 3, 2015 with **Exhibit A**, all evidencing the laptop – is a material evidence in a Federal criminal investigation – was seized by the DoD Criminal Investigation.

12. This court is made fully aware as to the criminal intent behind the plaintiff TRO relief was to destroy a material evidence, but the court didn't quash the TRO and assisted in Plaintiff effort in its attempt to destroy a material evidence by wrongfully granting a TRO and obstructed justice..

13. Knowing fully well and aware of the facts stated in foregoing paragraphs, and the criminal obstruction of justice by the plaintiff by seeking a TRO, so that the material evidence could be destroyed, it seems the Court is suggesting that Shekar should not co-operate with Federal law enforcement and DoD criminal investigators as to Federal criminal investigation against this plaintiff, which is deemed as an obstruction of justice by this court.

14. This court is aware from the motion to vacate filed on February 23, 2015 as well as from the **Exhibit A** of the motion to vacate that the material evidence, the laptop, was 'peacefully seized' from Shekar by the Dept of Defense criminal investigators and is in the custody of United States dept of justice and Dept of defense as attested by **Exhibit A**

15. In fact, even on the early morning of the day when the court entered the TRO on February 17, 2015, this court was aware granting a TRO to return the laptop will be an obstruction of justice and will amount to helping plaintiff destroying a material evidence in Justice dept investigation and Dept of Defense investigation, through an E mail sent to court on February 17, 2015 which is a part of the docket.

16. A complaint has been filed with the United States Attorney General , Mr. Eric Holder , **Exhibit B** , for obstruction of justice by this court, and as to this court continued effort to destroy a material evidence in a DoD Federal criminal investigation against the plaintiff .by aiding, harboring and assisting the plaintiff to continue to obstruct justice and to destroy the material evidence by continuing a TRO..

17. This court's continued harassment, threat and intimidation of Shekar by continue to hear the TRO matters related to laptop, which this Court is made aware many times that the laptop was seized by the DoD investigators- further evidence this Court determination to abuse the Federal judiciary under the veil of immunity- to assist , aid and harbor criminal obstruction of justice and this court's efforts to destroy a material evidence in a justice dept investigation..

18. The complaint filed with the United States Attorney General also seeks a referral to the Congress for impeachment and removal of Judge Guzman for criminal conduct of obstruction of justice and continued effort to destroy a material evidence in Dept of Justice criminal investigation as evidenced in the foregoing paragraphs.

19. This court continued harassment, intimidation and threats make it impossible to even to challenge the subject matter jurisdiction in this court .

20. This court deliberately assumed jurisdiction illegally and with malicious intent to assist the plaintiff to destroy a material evidence, and knowing fully well the material evidence is in justice dept custody and possession, continue to harass, threaten and intimidate the Shekar compelling to return the laptop to plaintiff .

21. United Sates Supreme court ruled that subject matter jurisdiction can be challenged anytime.

22. The case on the face of it should have been dismissed as wrongfully filed in Federal court since this court is made aware that :

- Plaintiff Teledyne operates under a pseudonym “Teledyne Storm Microwave” in Woodridge, Illinois.
- This court is aware Teledyne Storm Microwave is an “alter ego”, alias and d/b/d entity of Plaintiff.
- This court is aware that Teledyne Electronic Manufacturing services, another alter ego, alias, and d/b/a of Teledyne conducts extensive business in Illinois with a customer Northrop Grumman, located in Rolling Meadows, Cook County, Illinois.

The jurisdictional forum is in Illinois State Court in Cook County, Illinois.

23. This court is fully aware, as of the date of this motion, no notice of any documents filed ever served on Shekar and the summons on the complaint never served.

24. Since the plaintiff knew they can get their way around in this forum, this court further proved the bias, prejudice, partiality and hostility towards Shekar and entered *ex parte* rulings and continue to obstruct justice in a Dept of Justice and Dept o Defense criminal investigation and to assist the Plaintiff from getting prosecuted for their provable criminal wrong doings.

25. This court acts more like another attorney of plaintiff rather than an impartial jurist.

26. The district court has no jurisdiction in this case, no summons served on Shekar and Shekar do not accept this court jurisdiction and object to this jurisdiction, Hence any “*ex parte*” orders entered is not binding on Shekar who has not been served any summons, served any notice of TRO as required under Federal Rules, as well as for the reasons there is no subject matter jurisdiction .

27. This court continued to allow plaintiff to defraud the court with false E mail notices to have allegedly served Shekar through “ghost” E mail IDS and continued to allow such fraudulent notices knowing fully well that the purported notices sent o “obsolete” E mail ids do not exist . The court knowingly such fraud by Plaintiff to shield itself from abuse of entering *ex parte* orders. Plaintiff attorneys knew fully well , those barrage of E mail IDs listed in court document notice all are non-deliverable as they should have gotten error message to that effect per the ISP provider. A Federal investigation is initiated as to

plaintiff attorneys defrauding this court with false, fake E mail notices. Irrespectively , Shekar had never accepted E mail notices and he is not an Electronic filer.

28. This court continues to allow fraud by fake notices to have alleged given to “ghost E mail IDs” as the court knew from the E mail letter of February 17, 2015 which is part of the record, that the E mail IDs were no longer valid.

29 This court seems to be of vindictive to Shekar and determined to cause irreparable harm to Shekar abusing the judicial authority due to plaintiff filings tarnishing Shekar and projecting Shekar in an unfavorable light.

30 Shekar will be soon seeking justice dept attorneys to appear as to this court’s determination to carry out the crime of destroying a material evidence by threatening the defendant Shekar to turn over the lap top , which is in DoD custody .

31. Shekar is also be filing an appropriate petition/application with the Chief Justice of Supreme Court of United States which would include seeking a referral to Congress for impeachment and removal of Judge Guzman for criminal obstruction of justice and aiding , assisting , harboring plaintiff to destroy a material evidence. **.Exhibit C**

ARGUMENT :

A. 28 U.S.C. Section 455 require a Judge to disqualify himself in any proceedings in which his impartiality might reasonably questioned. Plaintiff can not only prove in a Judicial Misconduct complaint of bias, prejudice, but will offer sworn testimony before any Congressional proceedings to evidence that this court acted in bad faith, knowingly entered a TRO to assist, aid, harbor criminal conduct of obstruction of justice by the plaintiff whose criminal intent in seeking TRO is destroy a material evidence in Dept. of Justice criminal, investigation.

Recusal under Section 144 is **mandatory** when prejudice and bias warrants that the Judge shall proceed no further therein. The requirements of Section 144 are strictly construed and the statute is **heavily weighted in favor of recusal**. *Hoffman* , 368 F.3d at 718 (quoting *Sykes*, 7 F.3d at 1339)

B. Section 455 (a) is concerned with whether there would be an appearance of impropriety if given Judge presided over a case. *In re African American Slave Descendants Litig.*, 307 F.Supp.2d 977, 983 (N.D.Ill 2004) asks whether a reasonable person perceives a **significant risk that the Judge** will resolve the case on a basis **other than the merits**. *Hook v.McDade*, 89 F.3d 350, 354 (7th Cir.1996) .


CONCLUSION

This court has shown overflow of bias, prejudice, hostility, partiality and the attitude of the court thus far has been to irreparably harm Shekar in some way. In fact, the conduct of the court has been as if the court is a part of the plaintiff legal team rather than an impartial jurist.

WHEREFORE, for the reasons stated above and for good cause shown, appellant/Shekar seeks an order BY MAIL from this Court to recuse/disqualify/remove Judge Guzman from this case instant and stay all further proceedings until the appeal on jurisdiction is resolved.

In addition to all the above reasons, Shekar has sought a referral to Congress through United States Attorney General for impeachment and removal of Judge Ronald Guzman for knowingly indulging in criminal obstruction of justice and aiding, harboring and assisting plaintiff in its efforts to destroy material evidence in United States Justice Dept Criminal investigation against the plaintiff. This complaint with U.S. Attorney General further creates a conflict of interest and Shekar demand that Judge Guzman recuse immediately from this matter. In addition, Shekar had filed an "APPLICATION TO CHIEF JUSTICE OF UNITED STATES SUPRME COURT" seeking IMPEACHMENT AND REMOIVAL of Judge Guzman from the Federal Bench, which causes additional conflict .

WHEREFORE, for all the valid causes shown in the foregoing paragraphs, Shekar seeks an immediate recusal of Judge Guzman and all exparte orders entered without jurisdiction deemed null and void.



Raj Shekar

DEFENSE CRIMINAL INVESTIGATIVE SERVICE EVIDENCE PROPERTY RECEIPT

OFFICE	CASE CONTROL NUMBER	LOG NUMBER	DATE AND TIME OF SEIZURE
NAME OF PERSON FROM WHOM PROPERTY SEIZED		THIS RECEIPT MUST BE PRESENTED TO OBTAIN RELEASE (IF APPROPRIATE) OF ITEM(S) LISTED BELOW	
The property listed below was received this date by a Special Agent, Defense Criminal Investigative Service			
ITEM	QUANTITY	DESCRIPTION OF PROPERTY- MODEL NUMBER, SERIAL NUMBER, IDENTIFYING MARKS, CONDITION, AND VALUE WHEN APPROPRIATE.	
NAME AND SIGNATURE OF WITNESS (IF AVAILABLE)		NAME AND SIGNATURE OF RECEIVING S/A	

DCIS FORM 14 (NOV. 88)

EXHIBIT A

----- Original Message -----

From: CSA

To: [REDACTED]@usdoj.gov

Cc: [REDACTED]@usdoj.gov

Sent: Monday, March 02, 2015 1:30 PM

Subject: Criminal conduct by a judicial officer

Dear Bessie:

Per our conversation, kindly hand deliver this message to: Hon. Attorney General Holder Esq.

Via FAX, Email and Certified mail

Honorable Attorney General Eric H. Holder Esq.

U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001

Dear Mr. Holder:

First, congratulations on the commemorative portrait of yours in the Great Hall.

There is one more feather need to be added in your Federal Law enforcement laurels, before you exit the DOJ with stellar achievements, reason I am reporting this to you. I am sure you will prove again that " no one is above the law of the land or no one dare to violate the fundamental Constitutional rights of an individual United States citizens. as such rights are guaranteed by the United States Constitution"

I reported a criminal wrong doing by my former employer named Teledyne EMS, located in Tennessee. Teledyne violated the ITAR Export regulations related to defense, and military programs and disseminated sensitive, classified defense programs electronic files to outside USA entities including China to obtain cheap prices and enhance their personal financial fortunes. I raised questions when I discovered this to the management, in return I was retaliated and "squeezed out of the company" as I was perceived as a " whistle blower".

There is Dept of Defense criminal investigation underway. Please see my E mail to Mr. Jon Rymer in the below thread.

A crucial material evidence of criminal wrongdoings by the Teledyne is a laptop computer, which is in DoD Criminal Investigative Unit possession. Please see attached.

In order to destroy this material evidence, Teledyne filed a frivolous, vexatious, harassment law suit against me seeking a TRO to retrieve the lap top from me, so that Teledyne can destroy the material evidence. This is obstruction of justice and criminal conduct of destroying a material evidence in a Federal Criminal investigation. **Knowing this fact fully well**, Judge Ronald Guzman at Northern District of Illinois, Eastern Division, Chicago, granted a TRO ordering me to return the laptop- the laptop which was peacefully seized from me by DoD Criminal Investigation unit as you see from the attachment.

EXHIBIT B

I am filing a complaint against Ronald Guzman for indulging in criminal conduct of obstruction of justice, aiding, harboring and assisting the plaintiff Teledyne to destroy a material evidence in Federal criminal prosecution against Teledyne; abuse of the judicial authority and the oath of office. I also suspect "bribes or kick backs" received by Ronald Guzman, as Teledyne being a multi million dollar company and represented by a firm Winston & Strawn.

I am seeking a criminal indictment on Judge Guzman, Teledyne and its officers, employees (named in the IG's E mail below), the attorneys Daniel Webb, George Webb, Stephen D'Amore, Aviva -Grumet Morris, Benjamin Ostrander for criminal obstruction of justice and attempt to destroy a material evidence in a Federal criminal investigation and filing perjured affidavits by the attorneys and employees of Teledyne to impress upon the court wrongfully and to defraud and circumvent the Civil legal system to thwart a Federal Criminal investigation.

I am also seeking a **referral from your office to the Congress for impeachment and removal of Judge Guzman from the Federal Judiciary for provable criminal conduct of obstruction of justice aiding, harboring assisting Teledyne to destroy a material evidence, after court fully informed and aware that the laptop is in DoD custody ; still entered a TRO (exparte) ; still harassing me with threats of contempt of court for not returning the laptop (which is in Justice dept custody) , so that Teledyne can destroy the crucial material evidence.**

Judge Guzman flagrant abuse of judiciary and evident from **his continued effort to aid, harbor and assist to destroy a material evidence further proves that Guzman resolved to abuse the judicial authority** under the veil of immunity, to threaten me with contempt if I don't help Mr. Guzman and his " client" Teledyne in destroying the material evidence in DoD Criminal Investigation custody.

The conduct of Judge Guzman is not immune as he has committed knowingly a Federal Criminal act of **obstruction of justice and an attempt to destroy a material evidence in a Federal Criminal Investigation** by the DoD . Judge Guzman criminal conduct is no different than politicians like Governors who have absolute immunity and are still under the law and goes to jail for criminal wrongdoings, , and answerable to the " law of the land " - for criminal wrongdoing, be it corruption, or **obstruction of justice, destruction of material evidence in DOJ investigation like Mr. Guzman is attempting to do.**

[REDACTED]

[REDACTED]

Under "Federal whistle blower protection" , and protection statutorily extended to " Whistle Blowers" , staking my job , I brought the criminal wrong doings to light .

[REDACTED]

The criminal intent and motive by Teledyne who hired a high priced law firm to fight [REDACTED] should be clear to you. A criminal conviction coming out of DoD , Federal Criminal investigation , will bar Teledyne to bid on defense and military programs. The desperate effort to retrieve the material evidence for a Federal prosecution - laptop is an evidence of the criminal intent to destroy the evidence. Judge Guzman is a willing participant, accomplice in this criminal effort of obstruction of justice by aiding , harboring and assisting Teledyne. I also believe Judge Guzman and his staff in co-operation with plaintiff, are blocking my court filings, deliberately delay my filings which is another criminal violation of obstruction of justice.

I request your office to take this matter on **top priority and extremely urgent category**, as Teledyne EMS , as stated in my E mail below to Jon Rymer , is a threat to National Security and Homeland Security.

With my very Best Regards,

Respectfully,

Raj Shekar , a True American
President & CEO
CSA Ltd

cc: [REDACTED]

No. _____

**IN THE
SUPREME COURT OF THE UNITED STATES**

Raj Shekar,

Applicant,

v.

Ronald Guzman

Respondent..

**EMERGENCY APPLICATION TO THE CHIEF JUSTICE
Honorable John G. Roberts, Jr.**

**SEEKING AN ORDER FOR A REFERRAL TO
SENATE JUDICIARY COMMITTEE AND THE CONGRESS OF THE
UNITED STATES FOR IMPEACHMENT AND REMOVAL FROM FEDERAL
JUDICIARY OF DISTRICT JUDGE **Ronald Guzman**
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

FOR PROVABLE

**CRIMINAL CONDUCT OF OBSTRUCTION OF JUSTICE IN A DEPARTMENT
DEFENSE CRIMINAL INVESTIGATION AND AIDING, ASSISTING ,
HARBORING ATTEMPTS TO DESTROY A MATERIAL EVIDENCE IN
DEPARTMENT OF JUSTICE CRIMINAL INVESTIGATION AGAINST THE
PLAINTIFF , TELEDYNE TECHNOLOGIES ...Case no: 15-cv-1392**

**Raj Shekar
President , CSA Ltd
P.O. BOX 681085
Schaumburg, Il 60168-1085**

EXHIBIT C

DC

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

TELEDYNE TECHNOLOGIES
INCORPORATED,

Plaintiff,

v.

RAJ SHEKAR,

Defendant.

Case No. 1:15-cv-01392
Judge Ronald A. Guzman

FILED

MAR X 6 2015

NOTICE OF FILING

Aviva Grumet-Morris
35 W. Wacker Drive
Chicago, IL 60601-9703

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

Take notice on March 4, 2015, I have filed with the Clerk of District court for the Northern district of Illinois, Motion to Recuse, copy of which served upon you .


Raj Shekar

Courtesy copies sent to:

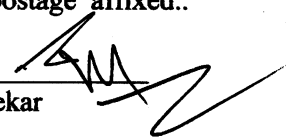
Hon Eric Holder
United States Attorney General
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001

Chief Justice John G. Roberts, Jr.
Presiding Officer, Judicial Conference of the United States
1 First Street, N.E Washington, D.C. 20543

Mr. James C. Duff
Conference Secretary and AO Director
Administrative Office of the U.S. Courts
One Columbus Circle, NE
Washington, D.C. 20544; tel. (202)502-2600

CERTIFICATE OF SERVICE

I hereby certify that on the date below the foregoing NOTICE OF FILING to the plaintiff at the address shown above by First Class Mail on March 4, , 2015 with proper postage affixed..


Raj Shekar